

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN DISASTER SITE

LITIGATION

JAN DOBROWOLSKI,

Plaintiff.

Case No.:

21 MC 102 (AKH) Docket No.:

NOTICE OF ADOPTION OF ANSWER TO MASTER

COMPLAINT

-against-

Jury Trial Demanded

110 WALL STREET LP, 233 BROADWAY OWNERS, LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, ALLRIGHT PARKING MANAGEMENT, INC., AMBIENT GROUP, INC., BANKERS TRUST CORPORATION, BATTERY PARK CITY AUTHORITY. BELFOR USA GROUP INC., BOARD OF EDUCATION OF THE CITY OF NEW YORK, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BOSTON PROPERTIES, INC., BT PRIVATE CLIENTS CORP., CENTRAL PARKING SYSTEM OF NEW YORK. INC., DEPARTMENT OF BUSINESS SERVICES. DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, EDISON PARKING MANAGEMENT, L.P., HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY, NEW YORK UNIVERSITY, RY MANAGEMENT CO., INC., RUDIN MANAGEMENT INC., STRUCTURE TONE GLOBAL SERVICES, INC., STRUCTURE TONE (UK), INC.

Defendants.

Defendants, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, and HUDSON VIEW EAST CONDOMINIUM, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Amended Complaint by Adoption (Amended Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the

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BRADY & BRENNAN, LLP
COUNSELORS AND
ATTORNEYS AT LAW
One Whitehall Street
New York, New York 10004
212-248-8800

Master Complaint is deemed to deny the allegations of the Amended Check-Off Complaint in this case. To the extent that defendants' Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Amended Check-Off Complaint in the above-caption matter, defendants deny knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendants demand judgment dismissing the above-captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York May 16, 2011

Yours etc.,

CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendants
BOARD OF MANAGERS OF THE HUDSON VIEW
EAST CONDOMINION, HUDSON VIEW EAST
CONDOMINIUM

By:

/ Jason J. Laver One Whitehall Street

New York, New York 10004

(212) 248 8800

TO: Gregory J. Cannata & Associates Attorneys for Plaintiff 233 Broadway – 5th Floor New York, New York 10279 (212) 553-9153

> Robert Grochow, P.C. Attorney for Plaintiff 233 Broadway – 5th Floor New York, New York 10279 (212) 553-9206

See Attached Rider

RIDER

EDISON PARKING MANAGEMENT L.P. 100 WASHINGTON STREET NEWARK, NEW JERSEY 07102

THE NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY 30-30 Thompson Avenue Long Island City, New York 11101

NEW YORK UNIVERSITY 70 Washington Square South New York, New York 10012

R Y MANAGEMENT CO., INC. 1619 Third Avenue New York, New York 10028

RUDIN MANAGEMENT INC. 345 Park Avenue New York, New York 10154

STRUCTURE TONE GLOBAL SERVICES, INC. 770 Broadway – 9th Floor New York, New York 10003

STRUCTURE TONE (UK), INC. 770 Broadway – 9th Floor New York, New York 10003

THAMES REALTY CORP. c/o Stephen Mann 488 Madison Avenue New York, New York 10022

THE BANK OF NEW YORK TRUST COMPANY NA 700 South Flower Street Los Angeles, CA 90017

BELFOR USA GROUP, INC. 185 Oakland Avenue, Suite 300 Birmingham, Michigan 48009 BOARD OF EDUCATION OF THE CITY OF NEW YORK c/o Corporation Counsel 100 Church Street New York, New York 10007

BOSTON PROPERTIES, INC. 599 Lexington Avenue New York, New York 10022

BT PRIVATE CLIENTS CORP c/o Deutsche Bank 60 Wall Street New York, New York 10005

CENTRAL PARKING SYSTEM OF NEW YORK, INC. 2401 21st Avenue South Suite 200 Nashville, Tennessee 37212-5309

DEPARTMENT OF BUSINESS SERVICES 110 William Street – 7th Floor New York, New York 10038

DEUTSCHE BANK TRUST COMPANY DEUTSCHE BANK TRUST COMPANY AMERICAS DEUTSCHE BANK TRUST CORPORATION 60 Wall Street New York, New York 10005

BANKERS TRUST CORPORATION

THE CITY OF NEW YORK c/o Corporation Counsel 100 Church Street New York, New York 10007

THE NEW YORK CITY DEPARTMENT OF EDUCATION 52 Chambers Street New York, New York 10007

TISHMAN INTERIORS CORPORATION 666 Fifth Avenue New York, New York 10017

TRIBECA LANDING L.L.C. c/o Rockrose Development Corp. Attn: General Counsel 290 Park Avenue South New York, New York 10010-5312

TULLY CONSTRUCTION CO. INC. 127-50 Northern Blvd. Flushing, New York 11368-1520

TULLY INDUSTRIES INC. 127-50 Northern Blvd. Flushing, New York 11368-1520

AFFIDAVIT OF SERVICE

STATE OF NEW YORK) ss.: COUNTY OF NEW YORK)

SHALISHA ALSTON, being duly sworn, deposes and says:

I am not a party to the action, I am over 18 years of age and I reside in New York County, New York.

On May 19, 2011, I served a true copy of the annexed NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT by electronic filing upon:

See Attached Rider

Sworn to before me this 19th day of May, 2011.

Margaret Flanagan NOTARY PUBLIC, State of New York No. 01FL6146569

Qualified in Suffolk County Term Expires: May 22, 20